

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Lifeline and Link Up Reform and
Modernization

WC Docket No. 11-42

Lifeline and Link Up

WC Docket No. 03-109

Federal-State Joint Board on Universal
Service

CC Docket No. 96-45

Advancing Broadband Availability
Through Digital Literacy

WC Docket No. 12-23

**COMMENTS OF THE
VERMONT DEPARTMENT OF PUBLIC SERVICE ON THE UNITED STATES
TELECOM ASSOCIATION PETITION FOR WAIVER**

The Vermont Department of Public Service (“DPS”) respectfully submits these comments in support of The United States Telecom Association’s Petition for Waiver in the above referenced dockets.¹ While the Lifeline and Link Up Reform and Modernization requires Eligible Telecommunications Carriers (“ETCs”) to determine eligibility through a process that includes an ETC receiving initial applications, in Vermont responsibility for making initial and ongoing Lifeline eligibility determination rests with a state agency, the Vermont Department of Children and Families (“DCF”). The current Vermont process does not contain a provision in which the state agency responsible for initially determining a subscriber’s eligibility, or recertifying a subscriber’s eligibility, provides to the serving ETC a copy of the subscriber’s

¹ See *Lifeline and Link Up Reform and Modernization*, Report and Order and Further Notice of Proposed Rulemaking, WC Docket No. 11-42, FCC 12-11 (rel. Feb. 6, 2012) (“Order”).

completed certification form. Rather, the Vermont process includes monthly lists of subscribers determined to be eligible for the Lifeline program.

I. SUMMARY

The DPS commends the Commission's intent to reform and modernize the Universal Service Fund's Lifeline program and welcomes the opportunity to support the United States Telecom Association's Petition for Waiver. The DPS agrees that without the granting the waiver of rule 54.407(d) and sections 54.410(b)(2) and (c)(2) of the Commission's rules, low-income Vermonters will suffer due to the state agency's inability to meet the requirement of the rules. More specifically, the current Vermont process does not provide a mechanism for the state agency to provide certification or recertification forms to the ETCs, which, under Commission rules, would block the ETCs from seeking reimbursement for providing Lifeline service to a subscriber as of June 1, 2012.

The application process in Vermont currently requires the completion of an application and certification process through a state agency, not through an ETC. The state agency is then responsible for providing monthly notification of eligible Lifeline recipients to the ETCs; the certification form is retained by the state agency without the submission of the certification form to the ETCs. A change to the current practice would require an analysis to determine the most efficient and effective manner to distribute forms that would meet the Commission's objectives while continuing to minimize administrative costs to the program.

II. CONCLUSION

Based on the above stated, the DPS supports USTelecom's Petition for Reconsideration, as submitted to the Commission.

Respectfully submitted,

VERMONT DEPARTMENT OF
PUBLIC SERVICE

By: 

Sarah Hofmann, Deputy Commissioner